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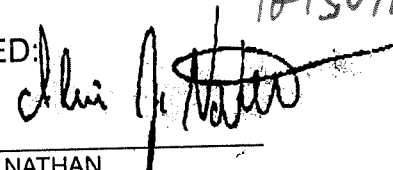
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Of Counsel
ADMITTED IN NY, FL & DC

December 26, 2019

Via ECF

Honorable Alison Nathan, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:


HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Re: Francisco Bautista v. Venture 2275, et al
Case No.: 19-cv-00916 (AJN)

Your Honor:

This firm represents all Plaintiff, Francisco Bautista, in the above-referenced wage and hour action brought against Defendants, Venture 2275 LLC and Anthony Nisthalal, for alleged violations of the Fair Labor Standard Act and the New York Labor Law. We write to request an extension of time for Plaintiff to file a motion for reconsideration related to the Court's Order, dated December 12, 2019. This is our first request for an extension of this deadline.

On December 11th, counsel for the parties appeared for a post-discovery status conference. In the resulting written Order, dated December 12, 2019, the Court memorialized the major points from its verbal Order at the status conference. However, due to the holidays this week, during which all of our staff was out of the office, the undersigned (who remained at the office) was unable to submit his intended motion for reconsideration. As such and because the undersigned will be on vacation for the next two weeks, we request that the deadline to file this motion, which is today,¹ be extended to January 10, 2020. Prior to making this application, we asked defense counsel for his consent, but he failed to get back to us. Thus, we respectfully ask the Court to grant our request.

Plaintiff's request is hereby granted. No further extensions will be allowed.
SO ORDERED.

Respectfully submitted,

/s/
Louis M. Leon, Esq. (LL 2057)

¹ We apologize to the Court for making this last-minute request. However, we believed that we would be able to submit the motion by today's deadline. However, once it became clear that this would not be possible, we reached out to defendants to obtain their consent and subsequently made this application.